

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

BRENTLEY GLENN ROXBY and TERRI ANN ROXBY,)	CASE NO. 17-70244-JAD
)	
Debtors)	CHAPTER 13
)	
RONDA J. WINNECOUR, CHAPTER 13)	
TRUSTEE,)	
)	
Movants)	Document No. _____
vs.)	
)	
BRENTLEY GLENN ROXBY and TERRI ANN ROXBY,)	
)	
Respondents)	

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS

AND NOW, come the Debtors, Brentley Glenn Roxby and Terri Ann Roxby, by and through their attorney, Forrest B. Fordham, III, Esquire, and file this Response to the Trustee's Motion to Dismiss:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted. Debtors are in agreement with the Trustee to pay \$3,050.00. to complete the plan and resume making long term continuing debt payments.
5. Admitted.
6. The Debtors seek to extend the term of their plan for 30 days and intend to pay the arrearage within this time.
7. Admitted.

Wherefore, the Debtors respectfully request that the Trustee's Motion to Dismiss be denied.

Dated: April 13, 2022

BY: /s/ Forrest B. Fordham, III
Forrest B. Fordham, III
Attorney for the Debtor
Highland Commons, 2nd Floor
351 Budfield Street
Johnstown, PA 15904
(814) 266-7425
PA Supreme Court I.D. 69596